

POOR LEGIBILITY

**PORTIONS OF THIS DOCUMENT
MAY BE UNREADABLE, DUE TO
THE QUALITY OF THE
ORIGINAL**



1927 LAKESIDE PARKWAY
SUITE 614
TUCKER, GEORGIA 30084
404-938-7710

1047

Rec'd
3/13/89

OK NFA C-586-3-9-11
Need to get it
done

March 8, 1989

Mr. A.R. Hanke
Site Investigation and Support Branch
Waste Management Division
Environmental Protection Agency
345 Courtland Street, N. E.
Atlanta, Georgia 30365

Date: _____
Site Disposition: _____
EPA Project Manager: _____

Subject: Preliminary Reassessment
Pullman Standard
Birmingham, Jefferson County, Alabama
EPA ID No. ALD004017729
TDD No. F4-8811-20

Dear Mr. Hanke:

FIT 4 conducted a preliminary reassessment of Pullman Standard Company in Birmingham, Alabama. The assessment included a review of EPA and state file material, completion of a target survey and a drive-by reconnaissance of the facility on December 1, 1988.

Pullman Standard has been fabricating steel in the production of railroad cars since 1929 (Ref. 1). This process involved welding, riveting, bolting, shot blasting, and painting. Waste products include waste paint and solvents including toluene and xylene. This facility closed in 1980 at which time all remaining waste products were removed from the site. At that time, Pullman Standard did not withdraw their RCRA interim status in the hope that the facility would be able to reopen or be bought out. In late 1983, Trinity Industries of Dallas, Texas, purchased the facility and operations resumed on September 1, 1984 (Ref. 1).

For approximately 10 years prior to ceasing operations, waste materials were kept in drums at the facility. During this time waste paints were kept in their original drums and placed in the facility yard. Before 1970, the waste paint materials were hauled from the site every 5-6 years. Before the mid 1960's, the painting was done outside and use of solvents was limited. In or around 1965, a building was erected to house the painting operations. At that time Pullman Standard began using more solvents to clean the reusable stencils. The method of disposal of these waste materials is uncertain. There are no records indicating any onsite disposal of hazardous waste. Currently, Pullman is classified as a hazardous waste generator under RCRA. The company withdrew its Part B application as a storage facility (Ref. 2).

Pullman Standard is located in the Birmingham Valley physiographic section of the Valley and Ridge Physiographic Province (Ref. 3). The area is characterized by northeast-southwest trending valleys and ridges, which exhibit extensive faulting and folding (Ref. 3, pp. 1, 3). As a result of these structural features vast differences in geologic and hydrogeologic environments occur over distances of only a few miles (Ref. 3, p. 1). Groundwater occurs in solution cavity channels and fracture zones

REFERENCES

1. Potential Hazardous Waste Site Preliminary Assessment (EPS forms 3012-II and 3012-111) for Pullman Standard.
2. Joe Downey, Alabama Department of Environmental Management, telephone conversation with Bob Tolford, NUS Corporation, December 12, 1988. Subject: RCRA status of four Alabama sites.
3. T. B. Moffett, and P. H. Moser, Groundwater Resources of the Birmingham and Cahaba Valleys of Jefferson County, Alabama, Circular 103, (University, Alabama: Geological survey of Alabama, 1978), pp. 1-44.
4. W. D. Johnson, Groundwater in the Palozoic Rocks of Northern Alabama, Special Report No. 16, (Geologic Survey of Alabama, 1933).
5. U.S. Department of Commerce, Climatic Atlas of the United States, (Washington, D.C.: GPO, June 1968), Reprint: 1983, National Oceanic and Atmospheric Administration.
6. J. T. Kidd, Areal Geology of Jefferson County, (Geological Survey of Alabama, Atlas 15, 1979).
7. U.S. Geological Survey, 7.5 minute series Topographic Quadrangle Maps of Alabama, Concord 1979; Bessemer 1959 (Photorevised 1970 and 1978), Birmingham South 1959 (Photorevised 1970 and 1978), Greenwood 1959 (Photorevised 1978).
8. NUS Corporation, April 26, 1988. Field Logbook No. F4-814 for Reconnaissance of Hayes International Corporation, TDD No. F4-8804-48.
9. George Edwards, Vailhala Cemetary, telephone conversation with Bob Tolford, NUS Corporation, December 15, 1988. Subject: Recreational use of Valley Creek.

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within these tectonically altered rock units (Ref. 4). Recharge to groundwater is by percolation of precipitation. Net annual rainfall for the area is 11 inches (Ref. 5).

Geologic units that occur within a 4-mile radius of the site, in descending order include: the Parkwood Formation, the Floyd Shale; the Hartselle Sandstone; the Pride Mountain Formation; the Tuscomb Limestone, Fort Payne Chert, and Maury Formation; the Chattanooga Shale and Frog Mountain Sandstone; the Red Mountain Formation; the Chickamauga Limestone; the Attalla Chert Conglomerate Member of the Chickamauga Limestone; the Knox Group undifferentiated, the Ketona Dolomite, and the Conasauga Formation (Ref. 6, Maps 19, 20, 26). Together, these units represent an aggregate thickness of over 10,000 feet of sediment. The presence and thickness of any particular rock unit is dependent on its location within this complex structural setting. Extensive faulting and folding has exposed at land surface the previously mentioned formations (Ref. 3, pp. 7-13). This structural complexity differs from the traditional "layer cake" concept of aquifer and confining layer. These aquifers are unconfined at the surficial outcrop, but may be confined at depth (Ref. 3, pp. 18, 19).

If any groundwater supplies in Jefferson County are used, they are primarily derived from rock units having well-developed water-bearing solution and structural features. Within a 4-mile radius of the facility, the Fort Payne Chert, Tuscomb Limestone aquifer and the Bangor Limestone aquifer are considered to have the greatest potential for development as a groundwater resource. These aquifers currently sustain large volume production wells with yields of greater than 150 gpm (Ref. 3, pp. 41, 42). However, these aquifers are not present in the immediate vicinity of the facility (Ref. 6, Maps 13, 14, 20, 21).

The water-bearing rock units underlying the facility are contained within the outcropping Conasauga Formation (Ref. 6, Map 20). The Conasauga Formation is considered to be a good aquifer in the area, and consists of thinly-bedded brownish-gray sublithographic limestone, gray shale, and brownish-gray dolomite (Refs. 4, pp. 96, 97; 6, p. 3). The beds within this formation dip steeply and contain well-developed solution features capable of producing large quantities of water (Ref. 4, pp. 96, 97). Groundwater from the Conasauga Formation occurs at variable depth from surficial springs to wells 600 feet deep (Ref. 3, pp. 60-75).

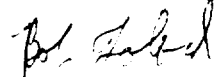
Surface water runoff from the site would be via two streams that flow to the northwest into Valley Creek. One stream transects the southwest end of the facility property, the other stream is located about 1000 feet northeast of the northeast end of the property (Ref. 7). There are no surface water intakes within 15 miles downstream of the facility (Ref. 8). Valley Creek is not used for fishing (Ref. 9).

Bessemer purchases water from Birmingham, which services the majority of Jefferson County. Birmingham obtains its water from four sources that do not receive drainage from the facility. The intakes are on the Cahaba River (intake is at Elmore Lake, if level is too low, water is drawn from Lake Purdy), Smith Lake (located in Walker County), and Inland Lake (located in Blount County) (Ref. 8). There are no drinking water wells within a 4-mile radius of Pullman Standard.

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Based on the above-referenced information and enclosures, FIT 4 recommends that no further remedial action be planned for this facility.

Very truly yours,



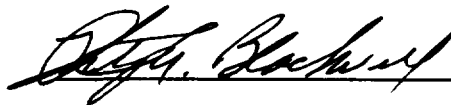
Bob Tolford
Project Manager

BT/kw

Enclosures

cc: _____ EPA PO

Approved:



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
EPS FORM 3012-II

TELEPHONE LOG SHEET

1. Site Identification:Site number: ALD004027729Site name: Pullman Standard, Division of Pullman Inc.2. Interview Data: (Party called)Name: Hugh BryantPosition: Plant ManagerFirm: Pullman StandardAddress: 5th Ave. and 24 th St.Bessemer, Al. 35020Telephone No.: (205) 425-32403. EPS Analyst Data:Name: Donahea DinsmorePurpose of call: Investigate past disposal activities, confirm current statusForm 2070-12 (7-81) P.N.Date of call: 9-10-84

4. Interview Narrative Summary: Pullman is now a division of Trinity Industries. They hope to operate under the Pullman name and will be operated locally. They are involved in fabricating steel. The main waste was from the painting of the railcars. During the last ten years of operations, waste ~~and~~ materials were kept on-site and when the plant closed, all materials were removed as has been indicated. Before that time the paint was hauled off-site and he believes that it was burned. During the mid 1960's they built a building to house the painting operations. At that time he believes that they began to use the Toluene and xylene. The re-usable stencils had to be cleaned when they got clogged. Before that time, the painting operations were done outside. To the best of his knowledge, there has been no on-site disposal of hazardous materials. When questioned about the listing of the cresols on the part A application, he was unaware that this had ever been used.

(He indicated that the paint waste was only hauled off every 5-6 years.)

5. Disposition/Comments:

No further action at this site at this time. There has been no on-site disposal of materials to the best of their knowledge and when they ceased operations in 1980 they did do extensive cleaning to remove any remaining waste materials and comply with the RCRA regulations.

6. Comments: Any additional sites used by this company?Location: Local landfillsDates of use: 1929-1970Description of waste: paint waste and solvents

Comments: Although this was not specifically indicated during the interview, the reviewer believes that use of the local landfills was a definite possibility. The company operated for many years before the regulations and landfilling was common.

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
EPS FORM 3012-III

INDUSTRIAL NARRATIVE SHEET

1. Site Identification:

Site number: ALD004027729

Site name: Pullman Standard, Division of Pullman Inc.

Site county: Jefferson

2. Industrial Narrative Summary:

Company Name: Pullman Standard, Division of Pullman Inc.

Address: 5th Avenue and 24th Street
Bessemer, AL 35020

Telephone No.: 205/425-3240

Contact: Hugh Bryant

Discussion: Pullman Standard fabricates steel in the production of railcars. In this process they are involved in welding, riveting, bolting, shot blasting, and painting. Their waste products include waste paint as well as the solvents toluene and xylene. This facility closed during 1980 and at that time, they spent both time and money to remove all the remaining waste products from the site. They did not withdraw from interim status in the hope they would be able to reopen or be bought out. In late 1983, they were purchased by Trinity Industries of Dallas, Texas, and operations have resumed as of September 1, 1984. At this time they hope to operate under the Pullman name and remain a division of Trinity Indust. They will operate as a generator only.

For approximately 10 years prior to ceasing operations, waste materials were kept in drums at the site. Waste paints that were left over were kept in the original drum and placed in their yard. Before that time, waste paint materials were hauled from the site every 5-6 years. The company representative believed that the materials were burned. Before the mid 1960's, the painting operations were done outside and they did not use a great deal of solvents. In or around 1965, they built a building to house the painting operations and at that time they began using more solvents to clean the reusable stencils when they got clogged. Disposal of these materials is

uncertain. To the best of knowledge, there has been no on-site disposal of hazardous waste.

Withdrawal from interim status has been requested and granted. Before being allowed to withdraw from interim status, a representative from ADEM visited the site and evaluated the cleanup operations. At that time, they found the site to be clean with no evidence of any on-site disposal or unregulated areas.

3. Disposition:

No further action required at this site under this program. To their best knowledge, there has been no on-site disposal of hazardous wastes at this site and all remaining wastes were removed from the site when they closed in 1980. The company has withdrawn from interim status and has reopened recently under new ownership. They will be regulated as a generator only by ADEM.

4. Comments:

Specific information about disposal of the wastes was unavailable at this time. This reviewer believes that the potential exists that these waste materials were taken to local landfills in operation during the time period this company operated.

NUS CORPORATION AND SUBSIDIARIES

TELECON NOTE

CONTROL NO.

DATE: December 12, 1988

TIME: 08:45

DISTRIBUTION:

BETWEEN: Joe Downey

OF: ADEM

PHONE: (205) 271-7700

AND: Bob Tolford, NUS Corporation

Bob Tolford

DISCUSSION:

I asked Joe Downey to verify that Pullman Standard (ALD004017729) is a generator, an existing RCRA facility which has withdrawn their part A application. He concurred. He also said that Crown Central Petroelum (ALD075454058) is a small-quantity generator. He also said that the following are not RCRA facilities:

Bessemer Waste Dump (ALD004009395)

Jim Walter Resources Mine #3 (ALD980555890)

ACTION ITEMS:

REF. 5



CLIMATIC ATLAS OF THE UNITED STATES

Environmental Science Services Administration . Environmental D

90° 85° 80° 75° 70°



Reference
#7

OVERSIZED

DOCUMENT

MAP

"Rite in the Rain."
WEATHERPROOF



LEVEL

NOTEBOOK NO. 311

F4-814

Hayes International Co.

F4-8804-48

1943 North 50th St.

Birmingham, AL 35211

Douglas M. Chatham

REF. 8

a product of

J. L. DARLING CORPORATION

TACOMA, WASHINGTON 98421 U.S.A.

000003

Birmingham services the majority of Jefferson County. They do not service Trussville, Irondale, Leeds, or Romey Valley. They sell water to Grayville. Birmingham also sells water to Bessemer and Bessemer then sells to Pleasant Grove. Birmingham serves Tarrant and Gardendale, also. There may be some private wells in the New Bethel and Robbins area. Left water dept. at 2:55 p.m. EDT.

4-25-88 3:00 p.m. EDT

Met with Wayne Walker of the Irondale Water Company. Irondale has 4 wells located close to the city hall. The well depths are: #1 is 110 feet, #2 is 110 feet, #4 is 300 feet, and #5 is 300 feet. Irondale serves approximately 3000 people. Their coverage area is primarily within the city limits; however, they do have some lines past the city limit on the east side of town. Birmingham serves the immediate surrounding areas around Irondale. Left water department at 3:30 p.m. Irondale did not have a city map available.

000003

D.M. Chatham 4-26-88

D.M. Chatham 4-26-88

NUS CORPORATION AND SUBSIDIARIES

TELECON NOTE

CONTROL NO.

DATE: December 15, 1988

TIME: 14:15

DISTRIBUTION:

BETWEEN: George Edwards

OF: Valhalla Cemetary

PHONE: (205) 428-5331

AND: Bob Tolford, NUS Corporation

DISCUSSION:

Valhalla Cemetary is located on Valley Creek. I aksed Mr. Edwards if Valley Creek is used for fishing. He said that it is not, that local people consider the water too polluted, although it was much worse years ago, when the waters were reddish color.

ACTION ITEMS:

RCRA/NPL POLICY QUESTIONNAIRE FOR INITIAL SCREENING

Site Name: Pullman Standard Co.

City: Bessemer State: Alabama

EPA I.D. Number: ALD004017729

Type of Facility: Generator ☒ Treatment ☐ Transporter ☐ Storage (more than 90 days) ☐ Disposal ☐

I. RCRA APPLICABILITY

Has this facility treated, stored or disposed of a RCRA hazardous waste since Nov. 19, 1980? ☐ yes ☒ no

Has a RCRA Facility Assessment (RFA) been performed on this site? ☐ yes ☒ no

Does the facility have a RCRA operating or post-closure permit? If so, date issued ☐ yes ☒ no

Did the facility file a RCRA Part A application? ☐ yes ☒ no
If so:

- 1) Does the facility currently have interim status? ☐ yes ☐ no
- 2) Did the facility withdraw its interim status? ☐ yes ☐ no
- 3) Is the facility a known or possible protective filer? ☐ yes ☐ no

Is the facility a late (after Nov. 19, 1980) or non-filer that has been identified by EPA or the State? ☐ yes ☒ no

STOP HERE IF ALL ANSWERS TO QUESTIONS IN SECTION I ARE NO

II. FINANCIAL STATUS

Is the facility owned by an entity that has filed for bankruptcy under federal or State laws? ☐ yes ☐ no

III. RCRA ENFORCEMENT STATUS

Has the facility lost authorization to operate or had its interim status revoked? ☐ yes ☐ no

Has the facility been involved in any other RCRA enforcement action? ☐ yes ☐ no

RECONNAISSANCE CHECKLIST FOR HRS2 CONCERNS

Instructions: Obtain as much "up front" information as possible prior to conducting fieldwork. Complete the form in as much detail as you can, providing attachments as necessary. Cite the source for all information obtained.

Site name: Pullman Standard
City, County, State: Bessemer, Jefferson, Alabama
EPA ID No.: ~~ALD0004017729~~ ALD0004017729
Person responsible for form: Bob Telford
Date: 11/22/88

Air Pathway

Describe any potential air emission sources onsite: none noted

Identify any sensitive environments within 4 miles: none noted

Identify the maximally exposed individual (nearest residence or regularly occupied building - workers do count): workers at site

Groundwater Pathway

Identify any areas of karst terrain: N/A

Identify additional population due to consideration of wells completed in overlying aquifers to the AOC: no wells.

Do significant targets exist between 3 and 4 miles from the site? no

Is the AOC a sole source aquifer according to Safe Drinking Water Act? (i.e. is the site located in Dade, Broward, Volusia, Putnam, or Flager County, Florida) no

Surface Water Pathway

Are there intakes located on the extended 15-mile migration pathway? *No*

Are there recreational areas, sensitive environments, or human food chain targets (fisheries) along the extended pathway?

Onsite Exposure Pathway

Is there waste or contaminated soil onsite at 2 feet below land surface or higher? *unknown*

Is the site accessible to non-employees (workers do not count)? *No, site is fenced with chainlink + barbed wire*

Are there residences, schools, or daycare centers onsite or in close proximity? *yes, ~~Dunbar High School~~, Dunbar high school is abandoned. Hurd School is less than 1000' SE of the site*

Are there barriers to travel (e.g., a river) within one mile?

NO

HAZARD RANKING SYSTEM SCORING SUMMARY
FOR

PULLMAN STANDARD
EPA SITE NUMBER ALD004017729
BESSEMER
JEFFERSON COUNTY, AL
EPA REGION: 4

SCORE STATUS: IN PREPARATION

SCORED BY BOB TOLFORD
OF N U S
ON 12/08/88

DATE OF THIS REPORT: 03/01/89
DATE OF LAST MODIFICATION: 03/01/89

GROUND WATER ROUTE SCORE :	3.47
SURFACE WATER ROUTE SCORE:	2.38
AIR ROUTE SCORE :	0.00
<hr/>	
MIGRATION SCORE :	2.43

HRS GROUND WATER ROUTE SCORE

CATEGORY/FACTOR	RAW DATA	ASN. VALUE	SCORE
1. OBSERVED RELEASE	NO	0	0
2. ROUTE CHARACTERISTICS			
DEPTH TO WATER TABLE	20 FEET		
DEPTH TO BOTTOM OF WASTE	0 FEET		
DEPTH TO AQUIFER OF CONCERN	20 FEET	2	5
PRECIPITATION	53.0 INCHES		
EVAPORATION	42.0 INCHES		
NET PRECIPITATION	10.0 INCHES	2	2
PERMEABILITY	1.0×10^{-3} CM/SEC	2	2
PHYSICAL STATE		3	3
TOTAL ROUTE CHARACTERISTICS SCORE:			13
3. CONTAINMENT		3	3
4. WASTE CHARACTERISTICS			
TOXICITY/PERSISTENCE: TOLUENE			9
WASTE QUANTITY	CUBIC YDS	0	
	DRUMS	0	
	GALLONS	9999999	
	TONS	0	
TOTAL	50000 CU. YDS	8	8
TOTAL WASTE CHARACTERISTICS SCORE:			17
5. TARGETS			
GROUND WATER USE		1	5
DISTANCE TO NEAREST WELL	> 3 MILES		
AND	MATRIX VALUE	0	0
TOTAL POPULATION SERVED	0 PERSONS		
NUMBER OF HOUSES	0		
NUMBER OF PERSONS	0		
NUMBER OF CONNECTIONS	0		
NUMBER OF IRRIGATED ACRES	0		
TOTAL TARGETS SCORE:			8
GROUND WATER ROUTE SCORE (Sgw) = 3.47			

HRS SURFACE WATER ROUTE SCORE

CATEGORY/FACTOR	RAW DATA	ASN. VALUE	SCORE
1. OBSERVED RELEASE	NO	0	0
2. ROUTE CHARACTERISTICS			
SITE LOCATED IN SURFACE WATER	NO		
SITE WITHIN CLOSED BASIN	NO		
FACILITY SLOPE	1.0 %		
INTERVENING SLOPE	1.0 %	0	0
24-HOUR RAINFALL	4.5 INCHES	3	3
DISTANCE TO DOWN-SLOPE WATER	1000 FEET	2	4
PHYSICAL STATE		3	3
TOTAL ROUTE CHARACTERISTICS SCORE:			10
3. CONTAINMENT		3	3
4. WASTE CHARACTERISTICS			
TOXICITY/PERSISTENCE:TOLUENE			9
WASTE QUANTITY CUBIC YDS	0		
DRUMS	0		
GALLONS	9999999		
TONS	0		
TOTAL	50000 CU. YDS	8	8
TOTAL WASTE CHARACTERISTICS SCORE:			17
5. TARGETS			
SURFACE WATER USE		1	3
DISTANCE TO SENSITIVE ENVIRONMENTS		0	0
COASTAL WETLANDS	NONE		
FRESH-WATER WETLANDS	NONE		
CRITICAL HABITAT	NONE		
DISTANCE TO STATIC WATER	> 3 MILES		
DISTANCE TO WATER SUPPLY INTAKE	> 3 MILES		
AND MATRIX VALUE		0	0
TOTAL POPULATION SERVED	0		
NUMBER OF HOUSES	0		
NUMBER OF PERSONS	0		
NUMBER OF CONNECTIONS	0		
NUMBER OF IRRIGATED ACRES	0		
TOTAL TARGETS SCORE:			3
SURFACE WATER ROUTE SCORE (S _{SW}) = 2.39			

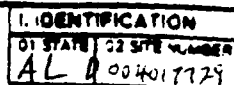
HRS AIR ROUTE SCORE

<u>CATEGORY/FACTOR</u>	<u>RAW DATA</u>	<u>ASN. VALUE</u>	<u>SCORE</u>
1. OBSERVED RELEASE	NO	0	0
2. WASTE CHARACTERISTICS			
REACTIVITY:			
INCOMPATIBILITY		MATRIX VALUE	
TOXICITY			
WASTE QUANTITY	CUBIC YARDS		
	DRUMS		
	GALLONS		
	TONS		
	TOTAL		
TOTAL WASTE CHARACTERISTICS SCORE:			N/A
3. TARGETS			
POPULATION WITHIN 4-MILE RADIUS			
0 to 0.25 mile			
0 to 0.50 mile			
0 to 1.0 mile			
0 to 4.0 miles			
DISTANCE TO SENSITIVE ENVIRONMENTS			
COASTAL WETLANDS			
FRESH-WATER WETLANDS			
CRITICAL HABITAT			
DISTANCE TO LAND USES			
COMMERCIAL/INDUSTRIAL			
PARK/FOREST/RESIDENTIAL			
AGRICULTURAL LAND			
PRIME FARMLAND			
HISTORIC SITE WITHIN VIEW?			
TOTAL TARGETS SCORE:			N/A

AIR ROUTE SCORE (Sa) = 0.00

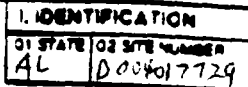


Site Inspection Report



Bob Colford	NUS	(404) 938-7710	MONTH DAY YEAR
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USA FORM 2876-13 (7-01)



<input type="checkbox"/> A TOXIC	<input type="checkbox"/> E SOLUBLE	<input type="checkbox"/> I HIGHLY VOLATILE
<input type="checkbox"/> B CORROSIVE	<input type="checkbox"/> F INFECTIOUS	<input type="checkbox"/> J EXPLOSIVE
<input type="checkbox"/> C RADIOACTIVE	<input checked="" type="checkbox"/> G FLAMMABLE	<input type="checkbox"/> K REACTIVE
<input type="checkbox"/> D PERSISTENT	<input type="checkbox"/> H IRRITABLE	<input type="checkbox"/> L INCOMPATIBLE
		<input type="checkbox"/> M NOT APPLICABLE

EPA FORM 2070-13 (7-81)



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

1. IDENTIFICATION
01 STATE 02 SITE NUMBER
AL 004017729

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: None 04 NARRATIVE DESCRIPTION

Population served by surface water

01 ☐ B SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: None 04 NARRATIVE DESCRIPTION

Surface water supplies are not within the 15 mile pathway.

01 ☐ C CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: None 04 NARRATIVE DESCRIPTION

01 ☐ D FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: None 04 NARRATIVE DESCRIPTION

Wastes were removed in 1980.

01 ☐ E DIRECT CONTACT 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: None 04 NARRATIVE DESCRIPTION

01 ☐ F CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE _____) ☒ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: < 10 04 NARRATIVE DESCRIPTION

exact area unknown. Contamination may or may not have occurred.

01 ☐ G DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: None 04 NARRATIVE DESCRIPTION

01 ☐ H WORKER EXPOSURE/ILLNESS 02 ☐ OBSERVED (DATE _____) ☒ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: unknown 04 NARRATIVE DESCRIPTION

workers may have been affected during operations prior to 1980 when operations ceased.

01 ☐ I POPULATION EXPOSURE/ILLNESS 02 ☐ OBSERVED (DATE _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: None 04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
AL 0004017774

II. HAZARDOUS CONDITIONS AND INCIDENTS *Continued*

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

*None observed, visual access to storage area prevented
due to size of overall facility.*

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION includes report of 1000000

02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

ditto

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

None

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES
Spills, Rupture, Standing Liquid, Leaking Drums

02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: *None* 04 NARRATIVE DESCRIPTION

No wastes present

01 ☐ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

None

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

None

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

Unknown

06 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

Unknown

III. TOTAL POPULATION POTENTIALLY AFFECTED: *None*

IV. COMMENTS

V. SOURCE OF INFORMATION How was information obtained? e.g., How was information verified?

Potential Hazardous Waste Site Preliminary Assessment Form (EPA Form 3012-111) for Pullman Standard



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION
PART 4 - PERMIT AND DESCRIPTIVE INFORMATION

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
AL 004017729

II. PERMIT INFORMATION

01 TYPE OF PERMIT ISSUED <small>Check all that apply</small>	02 PERMIT NUMBER	03 DATE ISSUED	04 EXPIRATION DATE	05 COMMENTS
<input type="checkbox"/> A NPDES				
<input type="checkbox"/> B UIC	ALD004017729			withdrew part B
<input type="checkbox"/> C AIR				
<input type="checkbox"/> D RCRA	ALD004017729			withdrew part B
<input type="checkbox"/> E RCRA INTERIM STATUS				
<input type="checkbox"/> F SPCC PLAN				
<input type="checkbox"/> G STATE <small>Specify</small>				
<input type="checkbox"/> H LOCAL <small>Specify</small>				
<input type="checkbox"/> I OTHER <small>Specify</small>				
<input type="checkbox"/> J NONE				

III. SITE DESCRIPTION

01 STORAGE/DEPOSAL <small>Check all that apply</small>	02 AMOUNT	03 UNIT OF MEASURE	04 TREATMENT <small>Check all that apply</small>	05 OTHER
<input type="checkbox"/> A SURFACE IMPOUNDMENT			<input type="checkbox"/> A INCINERATION	<input type="checkbox"/> A BUILDINGS ON SITE
<input type="checkbox"/> B PILES			<input type="checkbox"/> B UNDERGROUND INJECTION	
<input checked="" type="checkbox"/> C DRUMS ABOVE GROUND	unknown	unknown	<input type="checkbox"/> C CHEMICAL/PHYSICAL	
<input type="checkbox"/> D TANK ABOVE GROUND			<input type="checkbox"/> D BIOLOGICAL	
<input type="checkbox"/> E TANK BELOW GROUND			<input type="checkbox"/> E WASTE OIL PROCESSING	
<input type="checkbox"/> F LANDFILL			<input type="checkbox"/> F SOLVENT RECOVERY	
<input type="checkbox"/> G LANDFARM			<input type="checkbox"/> G OTHER RECYCLING/RECOVERY	
<input type="checkbox"/> H OPEN DUMP			<input checked="" type="checkbox"/> H OTHER <small>unknown</small>	
<input type="checkbox"/> I OTHER <small>Specify</small>				

06 COMMENTS

IV. CONTAMINANT

01 CONTAMINANT OF WASTE Check all that apply
☐ A. ADEQUATE, SECURE ☐ B. MODERATE ☐ C. INADEQUATE, POOR ☐ D. INSECURE, UNBOUND, DANGEROUS

02 DESCRIPTION OF DRUMS, DRUMS, LINES, BARRIERS, ETC.

Waste & question are no longer present.

V. ACCESSIBILITY

01 WASTE EASILY ACCESSIBLE: ☐ YES ☒ NO

02 COMMENTS

No waste present

VI. SOURCES OF INFORMATION Check all that apply

Potential Hazardous Waste Site Preliminary Assessment Form (EPA Form 3012-01) for
Pullman Standard



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
AL 0004017729

II. DRINKING WATER SUPPLY

01 TYPE OF DRINKING SUPPLY <small>Check all that apply</small>			02 STATUS			03 DISTANCE TO SITE	
	SURFACE	WELL	ENDANGERED	AFFECTED	MONITORED	A.	(ft)
COMMUNITY	A. <input type="checkbox"/>	B. <input type="checkbox"/>	A. <input type="checkbox"/>	B. <input type="checkbox"/>	C. <input type="checkbox"/>	A.	(ft)
NON-COMMUNITY	C. <input type="checkbox"/>	D. <input type="checkbox"/>	D. <input type="checkbox"/>	E. <input type="checkbox"/>	F. <input type="checkbox"/>	B.	(ft)

III. GROUNDWATER

01 GROUNDWATER USE IN VICINITY Check all that apply

☐ A. ONLY SOURCE FOR DRINKING ☐ B. DRINKING Other sources available ☐ C. COMMERCIAL/INDUSTRIAL IRRIGATION Limited other surface resources ☒ D. NOT USED, UNUSABLE

COMMERCIAL/INDUSTRIAL IRRIGATION No other water supplies available

02 POPULATION SERVED BY GROUND WATER <u>0</u>		03 DISTANCE TO NEAREST DRINKING WATER WELL <u>more than 4</u> (ft)			
04 DEPTH TO GROUNDWATER _____ (ft)	05 DIRECTION OF GROUNDWATER FLOW _____	06 DEPTH TO AQUIFER OF CONCERN _____ (ft)	07 POTENTIAL YIELD OF AQUIFER _____ (gpm)	08 SOLE SOURCE AQUIFER <input type="checkbox"/> YES <input type="checkbox"/> NO	

09 DESCRIPTION OF WELLS (including design, depth, and location relative to structures and buildings)

10 RECHARGE AREA <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		COMMENTS <u>By percolation of precipitation, Area has extensive faults + folds</u>	11 DISCHARGE AREA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		COMMENTS _____
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IV. SURFACE WATER

01 SURFACE WATER USE Check all that apply

☐ A. RESERVOIR, RECREATION, DRINKING WATER SOURCE ☐ B. IRRIGATION, ECONOMICALLY IMPORTANT RESOURCES ☐ C. COMMERCIAL/INDUSTRIAL ☒ D. NOT CURRENTLY USED

02 AFFECTED/POTENTIALLY AFFECTED BODIES OF WATER

NAME	AFFECTED	DISTANCE TO SITE
<u>Valley Creek</u>	<input type="checkbox"/>	<u>42</u> (ft)
_____	<input type="checkbox"/>	_____ (ft)
_____	<input type="checkbox"/>	_____ (ft)

V. DEMOGRAPHIC AND PROPERTY INFORMATION

01 TOTAL POPULATION WITHIN _____ MILES OF SITE			02 DISTANCE TO NEAREST POPULATION
ONE (1) MILE OF SITE A. _____ <small>NO. OF PERSONS</small>	TWO (2) MILES OF SITE B. _____ <small>NO. OF PERSONS</small>	THREE (3) MILES OF SITE C. <u>40,000</u> <small>NO. OF PERSONS</small>	<u>41</u> (ft)

03 NUMBER OF BUILDINGS WITHIN TWO (2) MILES OF SITE <u>many, it's an urban area</u>	04 DISTANCE TO NEAREST OFF-SITE BUILDING <u>41</u> (ft)
--	--

05 POPULATION WITHIN VICINITY OF SITE (Provide detailed description of nature of population within vicinity of site, e.g., rural, village, densely populated urban area)



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

1. IDENTIFICATION
01 STATE 02 SITE NUMBER

VI. ENVIRONMENTAL INFORMATION

31 PERMEABILITY OF SATURATED ZONE Check one

☐ A. $10^{-6} - 10^{-8}$ cm/sec ☐ B. $10^{-4} - 10^{-6}$ cm/sec ☒ C. $10^{-2} - 10^{-3}$ cm/sec ☐ D. GREATER THAN 10^{-2} cm/sec

32 PERMEABILITY OF BEDROCK Check one

☐ A. IMPERMEABLE Greater than 10^{-6} cm/sec ☐ B. RELATIVELY IMPERMEABLE $10^{-6} - 10^{-8}$ cm/sec ☒ C. RELATIVELY PERMEABLE $10^{-2} - 10^{-3}$ cm/sec ☐ D. VERY PERMEABLE Greater than 10^{-2} cm/sec

33 DEPTH TO BEDROCK

Fault Zone, could be anywhere

34 DEPTH OF CONTAMINATED SOIL ZONE

unknown (ft)

35 SOIL ON

unknown

36 NET PRECIPITATION

(in)

37 ONE YEAR 24 HOUR RAINFALL

4.5 (in)

38 SLOPE

SITE SLOPE

1.0 %

DIRECTION OF SITE SLOPE

NE

TERRAIN AVERAGE SLOPE

1.0 %

39 FLOOD POTENTIAL

SITE IS IN _____ YEAR FLOODPLAIN

☐ SITE IS ON BARRIER ISLAND, COASTAL HIGH HAZARD AREA, RIVERINE FLOODWAY

11 DISTANCE TO WETLANDS 500 ft minimum

ESTUARINE

OTHER

A. _____ (ft)

B. _____ (ft)

12 DISTANCE TO CRITICAL HABITAT for endangered species

_____ (ft)

ENDANGERED SPECIES: _____

13 LAND USE IN VICINITY

DISTANCE TO:

COMMERCIAL/INDUSTRIAL

RESIDENTIAL AREAS, NATIONAL/STATE PARKS,
FORESTS, OR WILDLIFE RESERVES

AGRICULTURAL LANDS
PRIME AG LAND AG LAND

A. 0 (ft)

B. 41 (ft)

C. _____ (ft)

D. 10 (ft)

14 DESCRIPTION OF SITE IN RELATION TO SURROUNDING TOPOGRAPHY

VII. SOURCE OF INFORMATION For example: references, e.g., maps, files, reports, studies, records



03 ESTIMATED DATE RESULTS AVAILABLE	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12
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OTHER

02 COMMENTS

OR IN CUSTODY OF

04 LOCATION OF MAPS

V. OTHER FIELD DATA COLLECTED (PLEASE ATTACH COPIES)

VI. SOURCES OF INFORMATION (Do not identify sources, i.e., give the names of persons, places, or organizations.)



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 7 - OWNER INFORMATION

I. IDENTIFICATION
01 STATE 02 SITE NUMBER

II. CURRENT OWNERS

PARENT COMPANY (if applicable)

01 NAME Trinity Industries		02 D+E NUMBER		08 NAME Trinity Industries		09 D+E NUMBER	
03 STREET ADDRESS (P.O. Box, Apt #, etc.) 5 th Ave + 24 th Street		04 SIC CODE		10 STREET ADDRESS (P.O. Box, Apt #, etc.) P.O. Box 568887		11 SIC CODE	
06 CITY Bessemer, Alabama		08 STATE Al		07 ZIP CODE 35020		12 CITY Dallas	
						13 STATE TX	
						14 ZIP CODE 75256-8887	
01 NAME		02 D+E NUMBER		08 NAME		09 D+E NUMBER	
03 STREET ADDRESS (P.O. Box, Apt #, etc.)		04 SIC CODE		10 STREET ADDRESS (P.O. Box, Apt #, etc.)		11 SIC CODE	
06 CITY		08 STATE		07 ZIP CODE		12 CITY	
						13 STATE	
						14 ZIP CODE	
01 NAME		02 D+E NUMBER		08 NAME		09 D+E NUMBER	
03 STREET ADDRESS (P.O. Box, Apt #, etc.)		04 SIC CODE		10 STREET ADDRESS (P.O. Box, Apt #, etc.)		11 SIC CODE	
06 CITY		08 STATE		07 ZIP CODE		12 CITY	
						13 STATE	
						14 ZIP CODE	
01 NAME		02 D+E NUMBER		08 NAME		09 D+E NUMBER	
03 STREET ADDRESS (P.O. Box, Apt #, etc.)		04 SIC CODE		10 STREET ADDRESS (P.O. Box, Apt #, etc.)		11 SIC CODE	
06 CITY		08 STATE		07 ZIP CODE		12 CITY	
						13 STATE	
						14 ZIP CODE	
01 NAME		02 D+E NUMBER		08 NAME		09 D+E NUMBER	
03 STREET ADDRESS (P.O. Box, Apt #, etc.)		04 SIC CODE		10 STREET ADDRESS (P.O. Box, Apt #, etc.)		11 SIC CODE	
06 CITY		08 STATE		07 ZIP CODE		12 CITY	
						13 STATE	
						14 ZIP CODE	

III. PREVIOUS OWNERS (List most recent first)

IV. REALTY OWNERS (if applicable, list most recent first)

01 NAME Pullman Standard		02 D+E NUMBER		01 NAME		02 D+E NUMBER	
03 STREET ADDRESS (P.O. Box, Apt #, etc.) 5 th Ave + 24 th Street		04 SIC CODE		08 STREET ADDRESS (P.O. Box, Apt #, etc.)		04 SIC CODE	
06 CITY Bessemer		08 STATE Al		07 ZIP CODE 35020		08 CITY	
						09 STATE	
						07 ZIP CODE	
01 NAME		02 D+E NUMBER		01 NAME		02 D+E NUMBER	
03 STREET ADDRESS (P.O. Box, Apt #, etc.)		04 SIC CODE		08 STREET ADDRESS (P.O. Box, Apt #, etc.)		04 SIC CODE	
06 CITY		08 STATE		07 ZIP CODE		08 CITY	
						09 STATE	
						07 ZIP CODE	
01 NAME		02 D+E NUMBER		01 NAME		02 D+E NUMBER	
03 STREET ADDRESS (P.O. Box, Apt #, etc.)		04 SIC CODE		08 STREET ADDRESS (P.O. Box, Apt #, etc.)		04 SIC CODE	
06 CITY		08 STATE		07 ZIP CODE		08 CITY	
						09 STATE	
						07 ZIP CODE	

V. SOURCES OF INFORMATION (List sources referenced, e.g., EPA files, owner records, etc.)



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 8 - OPERATOR INFORMATION

I. IDENTIFICATION
01 STATE 02 SITE NUMBER

II. CURRENT OPERATOR (Required if different from owner)

OPERATOR'S PARENT COMPANY (Required)

01 NAME Trinity Industries		02 D-S NUMBER		10 NAME Trinity Industries		11 D-S NUMBER	
03 STREET ADDRESS (P.O. Box, Apt. #, etc.) 5th Ave + 24th Street		04 SIC CODE		12 STREET ADDRESS (P.O. Box, Apt. #, etc.) P.O. Box 568887		13 SIC CODE	
05 CITY Bessemer		06 STATE AL	07 ZIP CODE 35020	14 CITY Dallas, TX		15 STATE	16 ZIP CODE 75356-5887
08 YEARS OF OPERATION 6		09 NAME OF OWNER					

III. PREVIOUS OPERATOR(S) (List most recent first, followed by all other past operators)

PREVIOUS OPERATORS' PARENT COMPANIES (Required)

01 NAME Pullman Stenhardt		02 D-S NUMBER		10 NAME		11 D-S NUMBER	
03 STREET ADDRESS (P.O. Box, Apt. #, etc.) 5th Ave + 24th Street		04 SIC CODE		12 STREET ADDRESS (P.O. Box, Apt. #, etc.)		13 SIC CODE	
05 CITY Bessemer		06 STATE AL	07 ZIP CODE 35020	14 CITY		15 STATE	16 ZIP CODE
08 YEARS OF OPERATION		09 NAME OF OWNER DURING THIS PERIOD					
01 NAME		02 D-S NUMBER		10 NAME		11 D-S NUMBER	
03 STREET ADDRESS (P.O. Box, Apt. #, etc.)		04 SIC CODE		12 STREET ADDRESS (P.O. Box, Apt. #, etc.)		13 SIC CODE	
05 CITY		06 STATE	07 ZIP CODE	14 CITY		15 STATE	16 ZIP CODE
08 YEARS OF OPERATION		09 NAME OF OWNER DURING THIS PERIOD					
01 NAME		02 D-S NUMBER		10 NAME		11 D-S NUMBER	
03 STREET ADDRESS (P.O. Box, Apt. #, etc.)		04 SIC CODE		12 STREET ADDRESS (P.O. Box, Apt. #, etc.)		13 SIC CODE	
05 CITY		06 STATE	07 ZIP CODE	14 CITY		15 STATE	16 ZIP CODE
08 YEARS OF OPERATION		09 NAME OF OWNER DURING THIS PERIOD					

IV. SOURCES OF INFORMATION (List names, addresses, and phone numbers of all persons who provided information for this report)



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 9 - GENERATOR/TRANSPORTER INFORMATION

I. IDENTIFICATION
01 STATE 02 SITE NUMBER

II. ON-SITE GENERATOR

01 NAME	02 D-S NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE

III. OFF-SITE GENERATOR(S)

01 NAME	02 D-S NUMBER	01 NAME	02 D-S NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE
01 NAME	02 D-S NUMBER	01 NAME	02 D-S NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE

IV. TRANSPORTER(S)

01 NAME	02 D-S NUMBER	01 NAME	02 D-S NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE
01 NAME	02 D-S NUMBER	01 NAME	02 D-S NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE

V. SOURCES OF INFORMATION (List sources of information, e.g., state files, company records, reports)



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 10 - PAST RESPONSE ACTIVITIES

I. IDENTIFICATION
01 STATE 02 SITE NUMBER

II. PAST RESPONSE ACTIVITIES

01 <input type="checkbox"/> A. WATER SUPPLY CLOSED 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> B. TEMPORARY WATER SUPPLY PROVIDED 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> C. PERMANENT WATER SUPPLY PROVIDED 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> D. SPILLED MATERIAL REMOVED 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> E. CONTAMINATED SOIL REMOVED 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> F. WASTE REPACKAGED 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> G. WASTE DISPOSED ELSEWHERE 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> H. ON SITE BURIAL 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> I. IN SITU CHEMICAL TREATMENT 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> J. IN SITU BIOLOGICAL TREATMENT 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> K. IN SITU PHYSICAL TREATMENT 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> L. ENCAPSULATION 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> M. EMERGENCY WASTE TREATMENT 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> N. CUTOFF WEIR 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> O. EMERGENCY GROUND/SURFACE WATER DIVERSION 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> P. CUTOFF TRENCH/SUMP 04 DESCRIPTION	02 DATE _____	03 AGENCY _____
01 <input type="checkbox"/> Q. SUBSURFACE CUTOFF WALL 04 DESCRIPTION	02 DATE _____	03 AGENCY _____



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 10 - PAST RESPONSE ACTIVITIES

I. IDENTIFICATION
01 STATE 02 SITE NAME

II PAST RESPONSE ACTIVITIES - CONTINUED

01 ☐ R BARRIER WALLS CONSTRUCTED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ S CAPPING/COVERING
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ T BULK TANKAGE REPAIRED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ U GROUT CURTAIN CONSTRUCTED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ V BOTTOM SEALED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ W GAS CONTROL
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ X FIRE CONTROL
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ Y LEACHATE TREATMENT
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ Z AREA EVACUATED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ 1 ACCESS TO SITE RESTRICTED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ 2 POPULATION RELOCATED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ 3 OTHER REMEDIAL ACTIVITIES
04 DESCRIPTION

02 DATE

03 AGENCY

III. SOURCES OF INFORMATION (SEE INSTRUCTIONS, 4-2, AND 4-3, OTHER CHECKED, REPORT)



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 11 - ENFORCEMENT INFORMATION

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER

II. ENFORCEMENT INFORMATION

01 PAST REGULATORY ENFORCEMENT ACTION ☐ YES ☐ NO

02 DESCRIPTION OF FEDERAL, STATE, LOCAL REGULATORY/ENFORCEMENT ACTION

III. SOURCES OF INFORMATION (also include references, e.g., state files, agency records, reports)

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
EPS FORM 3012-II

TELEPHONE LOG SHEET

1. Site Identification:

Site number: ALD004027729

Site name: Pullman Standard, Division of Pullman Inc.

2. Interview Data: (Party called)

Name: Hugh Bryant

Position: Plant Manager

Firm: Pullman Standard

Address: 5th Ave. and 24 th St.

Bessemer, Al. 35020

Telephone No.: (205) 425-3240

3. EPS Analyst Data:

Name: Donathea Dinsmore

Purpose of call: Investigate past disposal activities, confirm current status

Form 2070-12 (7-81) P.N.

Date of call: 9-10-84

4. Interview Narrative Summary: Pullman is now a division of Trinity Industries. They hope to operate under the Pullman name and will be operated locally. They are involved in fabricating steel. The main waste was from the painting of the railcars. During the last ten years of operations, waste ~~mat~~ materials were kept on-site and when the plant closed, all materials were removed as has been indicated. Before that time the paint was hauled off-site and he believes that it was burned. During the mid 1960's they built a building to house the painting operations. At that time he believes that they began to use the Toluene and xylene. The re-usable stencils had to be cleaned when they got clogged. Before that time, the painting operations were done outside. To the best of his knowledge, there has been no on-site disposal of hazardous materials. When questioned about the listing of the cresols on the part A application, he was unaware that this had ever been used.

(He indicated that the paint waste was only hauled off every 5-6 years.)

5. Disposition/Comments:

No further action at this site at this time. There has been no on-site disposal of materials to the best of their knowledge and when they ceased operations in 1980 they did do extensive cleaning to remove any remaining waste materials and comply with the RCRA regulations.

6. Comments: Any additional sites used by this company?

Location: Local landfills

Dates of use: 1929-1970

Description of waste: paint waste and solvents

Comments: Although this was not specifically indicated during the interview, the reviewer believes that use of the local landfills was a definite possibility. The company operated for many years before the regulations and landfilling was common.

ENVIRONMENTAL PROTECTION SYSTEMS, INC.
Alabama RCRA 3012 Site Ranking Scheme
EPS Form 3012-V

Site Name ALD004027729
Site Number Pullman Std

Preliminary Assessment Ranking Scheme to Determine Which Sites Merit
Further Action.

(Select one answer for each of the following seven questions)

1. Are Hazardous Substances Present?

- A. Confirmed on site!
- B. Suspected at site!
- C. It is unknown!
- D. No hazardous substances
- E. RCRA facility only!

10 points	_____
5 points	_____
2 points	_____
0 points	_____
0 points	<u>X</u>

2. Is There a Pollution Dispersal Pathway?

- A. Direct to surface and/or groundwater.
- B. Indirect to surface and/or groundwater.
- C. Suspected to surface and/or groundwater.
- D. Not known for sure.
- E. No pathway.

5 points	_____
4 points	_____
3 points	_____
2 points	_____
0 points	_____

3. Characteristics of Human Population?

- A. High density.
- B. Medium density.
- C. Low density.
- D. No population.

5 points	_____
4 points	_____
3 points	_____
2 points	_____

4. Characteristics of Natural Environment?

- A. Critical habitat including endangered species, etc.
- B. Sensitive habitat.
- C. Common less sensitive habitat.

5 points	_____
3 points	_____
2 points	_____

5. How is Human Population Affected By Site?

- A. Public utility of drinking water from site.
- B. Direct public access to site.
- C. Public access to affected surface water.
- D. Only potential for human population contact.
- E. Low or no potential for contact.

5 points	_____
4 points	_____
3 points	_____
2 points	_____
1 point	_____

6. Facility Management Practices at Site?

- A. Site actively supervised and managed currently with monitoring reports and other permit and report requirements.
- B. Site inadequately managed records not up-to-date.

1 point	_____
3 points	_____

C. Site not currently managed or regulated.

4 points

D. Abandon site.

5 points

7. Potential Responsible Parties for Site Operations?

A. Controlling party identified and accepts responsibility for site.

1 point

B. Suspected controlling party identified but does not accept responsibility for site.

4 points

C. No responsible party available.

5 points

Ranking Score =

$$\frac{0}{\#1} \times \left[\frac{\quad}{\#2} + \frac{\quad}{\#4} + \left(\frac{N/A}{\#3} \times \frac{\quad}{\#5} \right) + \frac{\quad}{\#6} + \frac{\quad}{\#7} \right]$$

TABLE 1. Ranking Assessment

NUMERICAL RANGE

0-50
50-150
150-300
300-450

PRIORITY ASSESSMENT

NONE
LOW
MEDIUM
HIGH

Ranking Score: 0

Priority Assessment: NONE

POTENTIAL HAZARDOUS WASTE
PRELIMINARY ASSESSMENT
EPS FORM 3012-I
EPS ANALYST/REVIEWER CHECKLIST

Site No. ALD004017729
Site Name PULLMAN STD.

Instructions: To be used in conjunction with EPA Form 2070-12 (7-81). Attach on inside front of site folder. Initial and date for all assessment entries under appropriate part/subpart as completed. Initial/date in black for final assessment; in red if higher level (additional) assessment is in order. Follow same procedure for review process.

Review Codes: 1-Toxicology Review; 2-Chemical Review; 3-Ecology Review; 4-Chemical Engineer Review; 5-Geotechnical Review; 6-Project Manager Review; 7-Final Review

1. ANALYST/REVIEW STATUS

Form 2070 Part Number	Analyst/ Date	Review Code 1	Review Code 2	Review Code 3	Review Code 4	Review Code 5	Review Code 6	Review Code 7
1.I.-VI.	DD 9/10/84						SW 9/10	SW 9/10
2.I.								
2.II.								
2.III.								
2.IV.								
2.V.								
2.VI.	DD.						SW	SW
3.I.								
3.II.A								
3.II.B								
3.II.C								
3.II.D								
3.II.E								
3.II.F								
3.II.G								
3.II.H								
3.II.I								
3.II.J								
3.II.K								
3.II.L								
3.II.M								
3.II.N								
3.II.O								
3.II.P								
3.III.								
3.IV.								
3.V.								

*No further assessment/review required, enter NA



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
AL D004017729

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)
PULLMAN STANDARD DIVISION OF PULLMAN INC

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
5TH AVE + 24TH ST.

03 CITY
BESSEMER

04 STATE 05 ZIP CODE 06 COUNTY 07 COUNTY CODE 08 CONG DIST
AL 35020 JEFFERSON 073 06

09 COORDINATES LATITUDE LONGITUDE
33 24 35. 085 56 48

10 DIRECTIONS TO SITE (Starting from nearest public road)
TAKE 9TH AVE NE TO 24TH ST. TURN RIGHT. STREET DEAD ENDS AT 5TH AVE. AT THE GATE ENTRANCE

III. RESPONSIBLE PARTIES

01 OWNER (If known)
TRINITY INDUSTRIES, INC

02 STREET (Business, mailing, residential)
4001 IRVING BLVD. Box 10587

03 CITY
DALLAS

04 STATE 05 ZIP CODE 06 TELEPHONE NUMBER
TX 75207 (214) 631-4420

07 OPERATOR (If known and different from owner)
PULLMAN STANDARD, DIVISION OF TRINITY IND.

08 STREET (Business, mailing, residential)
5TH AVE + 24TH ST.

09 CITY
BESSEMER

10 STATE 11 ZIP CODE 12 TELEPHONE NUMBER
AL 35020 (205) 425-3240

13 TYPE OF OWNERSHIP (Check one)
☒ A. PRIVATE ☐ B. FEDERAL ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)
☒ A. RCRA 3001 DATE RECEIVED: 11/18/80 MONTH DAY YEAR
☐ B. UNCONTROLLED WASTE SITE (CERCLA 103(c)) DATE RECEIVED: / / MONTH DAY YEAR
☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION
☒ YES DATE 7/11/84 MONTH DAY YEAR
☐ NO

BY (Check all that apply)
☐ A. EPA ☐ B. EPA CONTRACTOR ☒ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER (Specify)

CONTRACTOR NAME(S):

02 SITE STATUS (Check one)
☒ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION
1989 BEGINNING YEAR ENDING YEAR ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

TOLUENE, XYLENE, WASTE PAINT

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

NONE. WASTE MATERIALS WERE REMOVED IN 1980 WHEN THEY STOPPED MANUFACTURING. CLEANUP OF THE SITE WAS CONFIRMED BY ADEM. INTERIM STATUS WAS WITHDRAWN. AS OF SEPT. 1, 1984 OPERATIONS RESUMED UNDER THE OWNERSHIP OF TRINITY INDUSTRIES. THEY WILL BE OPERATING AS GENERATORS ONLY AND ARE IN CONTACT WITH ADEM.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)
☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☐ C. LOW (Inspection on non-availability basis) ☒ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT
STEVE MAURER SCW

02 OF: Agency (organization)
ADEM

03 TELEPHONE NUMBER
(205) 271-7728

04 PERSON RESPONSIBLE FOR ASSESSMENT
DONALEA DINSMORE

05 AGENCY
EPS

06 ORGANIZATION
EPS

07 TELEPHONE NUMBER
(601) 922-8242

08 DATE
9/10/84 MONTH DAY YEAR



01 STATE	02 SITE NUMBER
----------	----------------

01 PHYSICAL STATES (Check all that apply)	02 WASTE QUANTITY AT SITE (Measures of waste quantities must be independent)	03 WASTE CHARACTERISTICS (Check all that apply)
<input type="checkbox"/> A. SOLID <input type="checkbox"/> E. SLURRY		<input type="checkbox"/> A. TOXIC <input type="checkbox"/> E. SOLUBLE <input type="checkbox"/> I. HIGHLY VOLATILE
<input type="checkbox"/> B. POWDER, FINES <input type="checkbox"/> F. LIQUID	TONS _____	<input type="checkbox"/> B. CORROSIVE <input type="checkbox"/> F. INFECTIOUS <input type="checkbox"/> J. EXPLOSIVE
<input type="checkbox"/> C. SLUDGE <input type="checkbox"/> G. GAS	CUBIC YARDS _____	<input type="checkbox"/> C. RADIOACTIVE <input type="checkbox"/> K. REACTIVE
<input type="checkbox"/> D. OTHER _____ (Specify)	NO. OF DRUMS _____	<input type="checkbox"/> D. PERSISTENT <input type="checkbox"/> H. IGNITABLE <input type="checkbox"/> L. INCOMPATIBLE
		<input type="checkbox"/> M. NOT APPLICABLE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE			
SOL	SOLVENTS			
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

[illegible]

CATEGORY	Q1 FEEDSTOCK NAME	Q2 CAS NUMBER	CATEGORY	Q1 FEEDSTOCK NAME	Q2 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

ADEM FILES, STAFF COMMUNICATION, CONVERSATION WITH HUGH BRYANT OF PULLMAN STANDARD.



**POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT**

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

II. HAZARDOUS CONDITIONS AND INCIDENTS *(Continued)*

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION *(Include name(s) of species)*

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES
(Spills/runoff/standing liquids/leaking drums)

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

01 ☐ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

V. SOURCES OF INFORMATION *(Cite specific references, e.g., state files, sample analysis reports)*



**POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT**

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ B. SURFACE WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ C. CONTAMINATION OF AIR

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ E. DIRECT CONTACT

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ F. CONTAMINATION OF SOIL

03 AREA POTENTIALLY AFFECTED: _____
(Acres)

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ G. DRINKING WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ H. WORKER EXPOSURE/INJURY

03 WORKERS POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ I. POPULATION EXPOSURE/INJURY

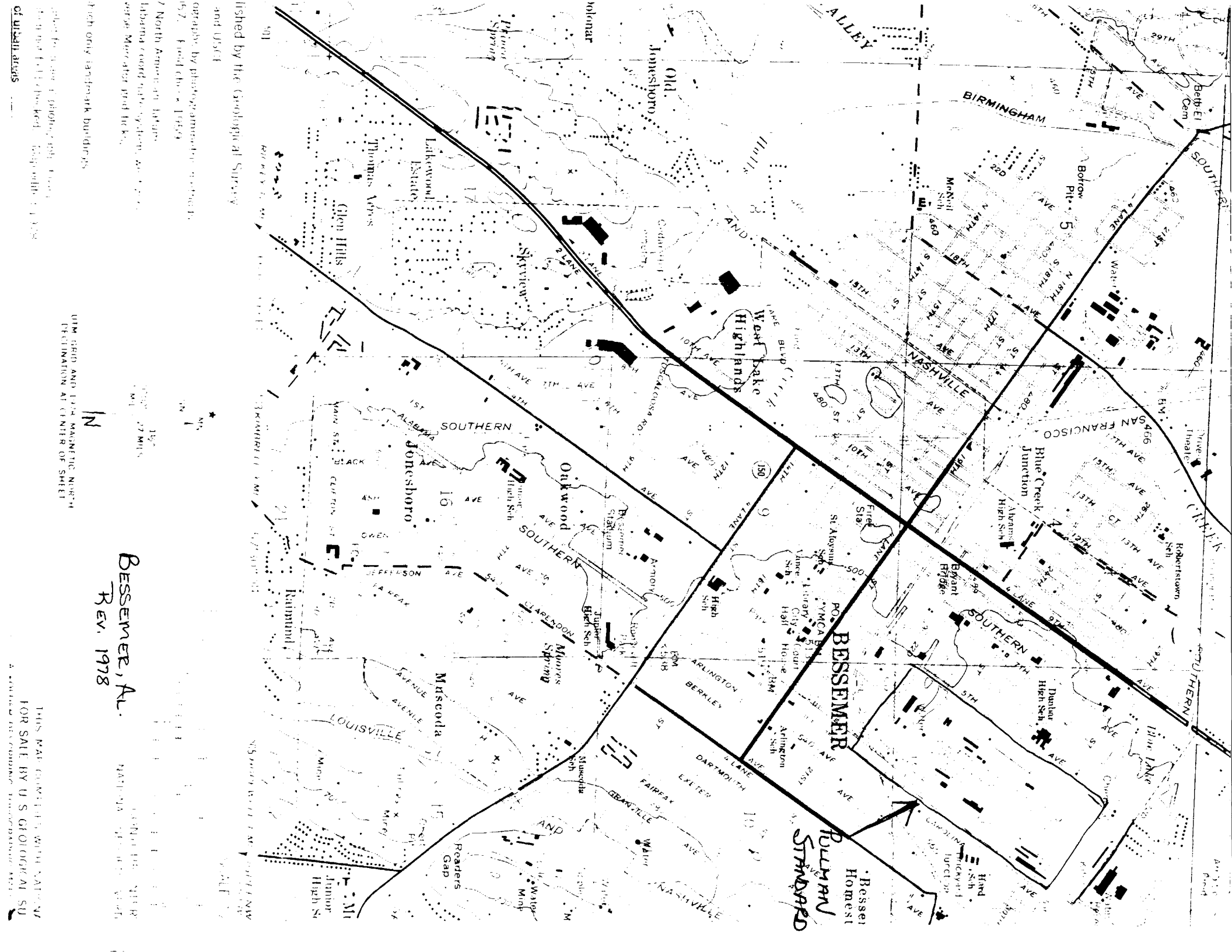
03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED



of urban areas

North American map
Alabama road map showing
where Major after grid ticks

each only landmark buildings
photographed by photogrammetric methods
1957. Final check 1969
finished by the Geological Survey
and USGFS

UTM GRID AND 1:250,000 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET
157
27 MILES
1:250,000
BESSEMER, AL.
REV. 1978
THIS MAP COME WITH NATIONAL
FOR SALE BY U.S. GEOLOGICAL SURVEY
A UNITED STATES GOVERNMENT PRINTING OFFICE

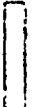
PROPERTY LINE

TOLUENE
TANKS



PAINT SHOP

No. 3 Erection Track

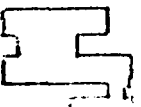


PAINT
STORAGE

No. 2 Erection Track

PUNCH AND SHEAR

No. 1 Erection Track



PROPERTY LINE

PULLMAN - STANDARD
BESSEMER PLANT

PROPERTY LINE

PROPERTY LINE



State of Alabama

DEPARTMENT OF PUBLIC HEALTH

State Office Building
Montgomery, Alabama 36130



IRA L. MYERS, M.D.
STATE HEALTH OFFICER

November 4, 1980

MEMORANDUM

TO: Mr. Bernard E. Cox, Jr., Chief, Hazardous Waste Section
Division of Solid and Hazardous Waste

FROM: Jack Honeycutt, Chief, Solid Waste Section
Division of Solid and Hazardous Waste

RE: Landfills on "Eckhardt Report"

The following is a status report on the installation of monitoring wells on existing sanitary landfills listed on the Eckhardt Report:

- 1) Bishop Landfill, Marshall County - Wells have been installed and samples collected one time.
- ✕ 2) John's Landfill, Jefferson County - Wells have been installed and samples collected one time.
- ✕ 3) New Georgia Landfill, City of Birmingham - Wells have been installed and samples collected one time.
- ✕ 4) Shannon Landfill, Jefferson County - Wells have been installed and samples collected one time.
- ✕ 5) City of Tuscaloosa Landfill - Well locations have been approved and in process of installation.
- 6) Johnson Landfill, Morgan County - Industrial landfill wells have been installed, samples collected and indications are the ground water is contaminated. Darrell Baker is working with Johnson and Mabry Engineering on this landfill. It is my understanding that closure plans have been submitted.
- 7) City of Decatur Landfill, Old Moulton Road - Well locations have been approved and installation should be in the near future.

ADEM

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



Mailing Address:
State Capitol
Montgomery, AL
6130
05/834-1303

July 31, 1984

MEMORANDUM

Field Offices:

P. O. Box 953
Tuscaloosa, AL
36602
05/353-1713

TO: BUDDY COX *BEC*
FROM: DAVID HAGAN *DH*
RE: Unresolved Withdrawal Requests

Unit 806, Building B
25 Oxmoor Circle
Birmingham, AL
35209
05/942-6168

The following facilities in the Birmingham area have been inspected by the writer within the last month and were found to be no longer treating, storing or disposing of hazardous wastes:

Pullman Standard Bessemer (ALD 004 017 729)

Pullman Standard has been closed for the past three (3) years. It was recently bought by Trinity Industries, Inc. of Dallas, Tx., and will reopen in August, 1984 employing less than 200 people. Hazardous wastes generated will be solvents (D001) and paint chips (D007). The facility plans to operate as a generator with less than 90 days storage, shipping all hazardous wastes to Diaz Refinery in Arkansas (ARD 092 915 735).

Exide Corporation Bham (ALD 078 975 331)

Exide's Bham Service Center was closed in 1981 and the building is presently occupied by the Helder Seablue Company. All hazardous wastes were removed by the time the facility closed down according to a June 6, 1982 letter from Exide to ADEM.

Gulf Oil Company Bham (ALD 000 604 249)

This facility operates as a generator with less than 90 day storage. Gulf generates leaded tank bottoms when fuel storage tanks are periodically cleaned. The waste is removed from the tanks directly into the transport vehicle for off-site disposal.

The above (3) three facilities are being sent withdrawal letters.

2. PROJECT MANAGEMENT SUMM

Site Name: PULLMAN STANDARD CO.
Site Number: ALD004017729
Owner: TRINITY INDUSTRIES, INC.
Operator: PULLMAN STANDARD, DIVISION OF TRINITY INDUSTRIES
Site Status: ☒ Active ☐ Inactive ☐ unknown
Priority: ☐ High ☐ Medium ☐ Low ☒ None

3. FINAL DISPOSITION

I. EPS Final Review - Date: 9/10/84
Comments: _____

Site Inspection Required ☐ Yes ☒ No

II. ADEM Review - Date: 10/10/84 SCM
Comments: _____

Follow-up Action Required ☐ Yes ☒ No

III. Final Disposition:

Review & revise Date: _____
Edited & correct Date: _____
Transmitted Date: _____
File close-out Date: _____
Initiate site inspection Date: _____

4. ADDITIONAL COMMENTS (ONGOING & FINAL)

TO THE BEST OF OUR KNOWLEDGE THIS
IS A RCRA FACILITY ONLY.

ADEM

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT



Mailing Address:
State Capitol
Montgomery, AL
36130
205/834-1303

Field Offices

P. O. Box 953
Tuscaloosa, AL
36602
205/353-1713

Mail Room Building B
25 Oxmoor Circle
Birmingham, AL
35209
205/942-6118

358 Midmost Drive
Mobile, AL
36609
205/343-7941

July 30, 1984

Mr. Hugh Bryant
Pullman Standard Company
P. O. Box 428
Bessemer, AL 35021

Re: Facility ALD 004 017 729

Dear Sir:

This is to acknowledge receipt of your request to withdraw your Part A, RCRA Permit Application. Since Alabama has Phase I Authorization, it will be our responsibility to determine if your request should be honored.

Based upon the information you supplied, it appears that your facility is no longer treating, storing, or disposing of hazardous waste and is, therefore, not subject to Alabama's Hazardous Waste Management Regulations. Therefore, your request to withdraw your Part A Application is granted. However, you should be aware that as a generator of hazardous waste you must meet the generator requirements of RCRA as specified in 40 CFR 262.

You should be aware that your request to withdraw interim status means that you may not treat, store, or dispose of hazardous waste without a permit issued under the authority of Code of Alabama 1975, Section 22-30-12, as amended, and the Regulations adopted thereunder.

Should you have questions or comments, please feel free to contact this office.

Sincerely,

Bernard E. Cox, Jr., Chief
Industrial and Hazardous Waste Section
Land Division

cc: Mr. James Scarbrough
USEPA - Region IV

Mr. Jerry Riddles
Trinity Industries, Inc.

TRINITY INDUSTRIES, INC.



July 17, 1984

Mr. David Hagan
Alabama Department of Environmental Management
Industrial and Hazardous Waste Section
State Cap
Montgomery, Alabama 36130

RE: Pullman Standard MFG., 5th Ave.
and 24th Street, Bessemer, Jefferson
County, Alabama 35020

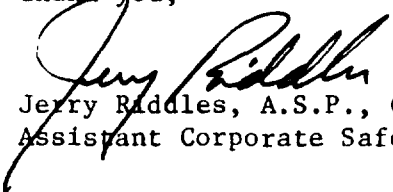
Dear Mr. Hagan:

Per our phone communication you will have attached to this cover letter a copy of Pullman Standard MFG. "Hazardous Waste Management Program & Guidelines". This program will cover all type of hazardous waste activities that Pullman may preform with Trinity Industries, Inc. You may find items in the program which Pullman may never get involved with, but Trinity is very diversified and depending on the economy we can change product lines in a short time.

The attached program does not have the weekly inspection of waste holding sites because this is worked out depending on the type of guard set up we have at each facility. The only other remaining are not covered in this program is the filling out of Waste Manifest. As you know the market is full of Waste Manifest depending what state you ship to or out of. Each manifest is different so at this time all maifest are filled out by me in Dallas and mailed to the plant and instructions are given to the person in charge of shipping. On or after September 24, 1984 when the uniform waste manifest go into effect I will revise not only Pullmans waste management programs but all Trinity owned plants manuals.

I am still looking froward to a updated copy of Alabama's "Hazardous Waste" rules from you as per our phone communication. Please address all correspondance to my attention, and if you have any questions please let me know.

Thank you,


Jerry Riddles, A.S.P., C.H.C.M.
Assistant Corporate Safety Director

JR:cc

Attachment:
cc: Hugh Bryant-Pullman Bessemer

JD



Pullman Standard

5th Avenue and 24th Street
Bessemer, Alabama 35020
(205) 425-3231

March 12, 1984

Mr. B. E. Cox, Jr., Chief
Alabama Dept. of Environmental Management
Land Program
State Capital
Montgomery, AL 36130

Dear Mr. Cox:

In submitting our EPA Annual Report Form for 1983 as per your recent letter of instruction, please note that I have marked a zero under Items "C", "D" and "VI." Since the plant status is the same as it was in late 1980, 1981 and 1982, i.e., no production and totally shutdown, we have neither purchased, stored, used, nor generated any hazardous material of any kind. This was discussed with Mr. Joe Brewer by telephone on 3-9-83, and on his recommendation, I am including a cover letter with the Annual Report.

If there are any questions, please give me a call.

Very truly yours,

PULLMAN STANDARD

H. S. Bryant, Jr.
General Manager

HSBJr;ec

Attachments





IRA L. MYERS, M.D.
STATE HEALTH OFFICER

State of Alabama
DEPARTMENT OF PUBLIC HEALTH

State Office Building
Montgomery, Alabama 36130

May 13, 1982



Mr. James H. Scarbrough, Chief
Residuals Management Branch
USEPA-Region IV
345 Courtland Street
Atlanta, Georgia 30365

Re: Part A Status

Dear Mr. Scarbrough:

Enclosed are copies of letters from facilities requesting a change in their original Part A applications. These facilities are listed by name and I.D. number for quick reference. The states recommendation will also be noted by facility:

Georgia-Pacific Corporation- Belk, Alabama-ALD063669626-State concurs with withdrawal request.

Georgia-Pacific Corporation-Talladega, Alabama-ALD063662597-State concurs with withdrawal request.

Pullman-Standard-Bessemer, Alabama-ALD004017729-EPA and State have written status request letters to company. Response to State request enclosed. Facility not in use since October, 1980, due to plant shutdown. Company may reopen this summer so State recommends that Part A not be withdrawn at this time.

If you need additional information regarding these facilities, please contact this office.

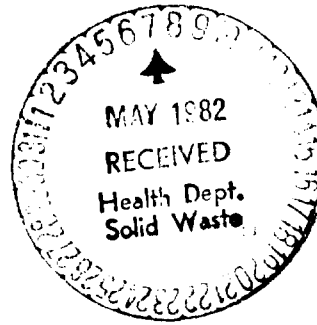
Sincerely,

Bernard E. Cox, Jr., Chief
Industrial and Hazardous Waste Section
Division of Solid and Hazardous Waste

BEC:DLR:rc



Pullman Standard



5th Avenue and 24th Street
Bessemer, Alabama 35020
(205) 425-3231

May 6, 1982

Mr. David L. Robertson
Pollution Control Specialist
Industrial and Hazardous Waste Section
Division of Solid and Hazardous Waste
Department of Public Health
State Office Building
Montgomery, AL 36130

Dear Mr. Robertson:

RE: Closing of Storage Area (Paint) at Bessemer Plant

As stated in our letter to Mr. Harvanek, dated August 10, 1981, our plant has not been in production since October 1980, and was officially closed February 28, 1981.

There has been no painting operations since the October 1980 date and no purchase or delivery of any paint for this plant two months prior to that date. The remaining or unused quantities of paint on hand, after production ceased, were sold and removed from site to a company in Fultondale, AL, for reclaiming purposes. (So stated in our letter to you dated September 17, 1980 from D. F. Winn, Plant Engineer, Pullman Standard.)

The storage area in field at north end of plant is void of any containers of paint, and the grounds have been cleaned up for at least a one year period. Also cleaned up during that same time were the floors and paint equipment in building where paint operations had been performed.

We feel that in view of the steps taken, and considerable cost incurred toward clean up and removal of paint storage from our plant premises, that there is nothing further to be done in order to comply with Hazardous Waste Management Regulations.

We would like to maintain the Part "A" of our Hazardous Waste Permit active as you recommended.

Mr. David L. Robertson

RE: Closing of Storage Area (Paint) at Bessemer Plant

May 6, 1982


Page Two

When, and if in fact, we do resume operations at this plant location, plans are to reapply for our Hazardous Waste Permit.

Please contact this office if you have any questions.

Very truly yours,

PULLMAN STANDARD



H. S. BRYANT, JR.
General Manager

HSB:ec

cc: D. F. Winn

4E:CP

Mr. H. S. Bryant, Jr.
General Manager
Pullman Standard
5th Avenue and 24th Street
Bessemer, Alabama 35020

PULLMAN STANDARD

Re: EPA I.D. Number ALD004017729 - Request for withdrawal of RCRA Permit
Application at Bessemer, Alabama site.

Dear Mr. Gosnell:

Reference your letter of August 10, 1981, subject as above.

Please be advised that in terminating your operations at the above site, you are required to comply with the closure requirements of 40 CFR Part 265, Subpart G, Paragraphs 265.110 through 265.115, to ensure that closure takes place in such a manner that (a) minimizes the need for further maintenance, and (b) controls, minimizes or eliminates the post-closure escape of hazardous waste to the environment.

These requirements include the submission to EPA and the State of a closure plan identifying the steps necessary to completely close the facility, the removal or disposal of all hazardous wastes within 90 days after receipt of approval of the closure plan, the disposal or decontamination of all facility equipment and structures, and the submission of certifications both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan (see the cited paragraphs for the detailed requirements).

Any questions may be directed to the undersigned at 404-881-2017.

Sincerely yours,

John M. Harvanek III, P.E.
Regional Project Officer
For RCRA Notifications

cc: Mr. Don Cooper, Alabama Water Improvement Commission

bcc: Mike Taimi
Keith Castro
Jim Wilburn
Bob Tallini ✓
John Herrmann

Do NOT
Withdraw Part A
this facility is the
going to be closed
after it is closed
we will decide
then what to do
with the remaining
paper work
JW 9/3/81



Pullman Standard

5th Avenue and 24th Street
Bessemer, Alabama 35020
(205) 425-3231

September 17, 1980

Mr. David L. Roberson
Alabama Department of Public Health
Division of Solid Waste
& Vector Control
Environmental Health Adm.
State Office Building
Montgomery, Alabama 36130

Dear Mr. Roberson:

In response to your telephone conversation of September 15, 1980, this is to notify you that the scrap paint hauled from the plant by Moore Coal Company is to be delivered to City Supply Company at Fultondale. It is our understanding that this material is to be recycled for future use as paint.

Should you have any questions, please feel free to call.

Very truly yours,

PULLMAN STANDARD

D. F. Winn
D. F. Winn
Plant Engineer

JTG/dp

RECEIVED

SEP 18 1980

ST. LOUIS
DIVISION OF SOLID WASTE
& VECTOR CONTROL

City Supply Co. - 841-8141 Bradice Wall-OWNER

August 12, 1980

Mr. John R. Harris
Facilities Engineer
Pullman Standard
P. O. Box 428
Bessemer, Alabama 35020

Dear Mr. Harris:

Mr. Taylor and I appreciate the time you spent with us on August 7, 1980, discussing the new federal hazardous waste regulations and also the waste streams from your company. I am sorry that Mr. Wynn, your plant engineer, could not be present.

During our discussion, you stated that Moore Coal Company of Bessemer picked up your paint wastes and disposed of them. We request that you notify this office in writing as to the location of your disposal sites that Moore Coal uses for your wastes. This request is to determine if proper disposal is being achieved. Under the new regulations, the wastes from your company are your responsibility from generation to final disposal, if they are hazardous. A review of all your waste streams and ultimate disposal should be performed.

I am enclosing the listings you requested on hazardous waste disposal sites. I hope they can be of some use if your company needs one. New sites may become available so it will be up to your company to find a site that will fit its needs, and to assure that the site is permitted for your particular wastes.

Please review the regulations and particularly the "Criteria for Identification of Hazardous Wastes". If, after reviewing the materials, you have any questions, please feel free to contact this office.

Sincerely,

David L. Roberson, Environmentalist
Division of Solid Waste & Vector Control
Environmental Health Administration

DLR:bw

cc: Mr. Frank Phillips
Jefferson County Health Department

Enclosure

1.0.12.80

- 8) City of Decatur Landfill, Highway 31 - Well locations have been approved and installation should be in the near future.
- 9) Martintown Landfill, City of Scottsboro - Well locations have been approved, presently advertising for bids for construction.
- 10) Crow Mountain Landfill, Jackson County - Landfill in process of being closed out, should be completed in about thirty days.
- 11) Magnolia Landfill, Baldwin County - Well locations have been approved along with engineering plan. Well construction should be completed by February 23, 1981.
- 12) Red Hill Landfill, Baldwin County - No status, ground water criteria on ODI carried over to FY-81. No projected date for installation of wells.
- 13) Marengo County Landfill - No status, no projected date for installation of wells.
- 14) Crenshaw County Landfill - Well locations have been approved, construction should be in near future.
- 15) City of Montgomery Landfill - Well locations have been approved, construction should be completed in the near future.

All of the above landfills were listed for evaluation on the "Open Dump Inventory" in FY-80. Insufficient time, however, did not allow for well construction on all the sites. Johnson's Landfill was the only site inventoried that had monitoring wells installed with sufficient time to collect samples before the September 30, 1980 deadline. The ground water criteria was carried over on all the other sites to FY-1981 and are included in the ODI work plan approved by EPA.

REGION: 04
STATE : AL

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L A

PAGE: 1330
RUN DATE: 85/06/03
RUN TIME: 19:06:17

M.2 - SITE MAINTENANCE FORM

* ACTION: _ *

EPA ID: ALD004017729

SITE NAME: PULLMAN STANDARD CO SOURCE: H * _ _ _ _ _ *

STREET: 5TH AVE & 24TH ST CONG DIST: 07 * _ _ _ _ _ *

CITY: BESSEMER ZIP: 35021 * _ _ _ _ _ *

CNTY NAME: JEFFERSON CNTY CODE: 073 * _ _ _ _ _ *

LATITUDE: 33/24/35.0 LONGITUDE: 085/56/48.0 * _/_/_ _/_/_ _ *

MSMA: 1000 HYDRO UNIT: 03160112 * _ _ _ _ _ *

INVENTORY IND: Y REMEDIAL IND: Y REMOVAL IND: N FED FAC IND: N * _ _ _ _ _ *

NPL IND: N NPL LISTING DATE: NPL DELISTING DATE: * _ _/_/_ _/_/_ _ *

APPROACH: SITE CLASS: * _ _ _ _ _ *

SITE/SPILL IDS: * _ _ _ _ _ *

RPM NAME: RPM PHONE: - - * _ _ _ _ _ *

DIOXIN TIER: REG FLD1: REG FLD2: 6 * _ _ _ _ _ *

RESP TERM: PENDING () NO FURTHER ACTION (X) * PENDING () NO FURTHER ACTION () *

ENF DISP: NO VIABLE RESP PARTY () VOLUNTARY RESPONSE () * _ _ _ _ _ *

ENFORCED RESPONSE () COST RECOVERY () * _ _ _ _ _ *

SITE DESCRIPTION:

* _ _ _ _ _ *

* _ _ _ _ _ *

* _ _ _ _ _ *

* _ _ _ _ _ *

REGION: 04
STATE : AL

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L A

PAGE: 1331
RUN DATE: 85/06/03
RUN TIME: 19:06:17

M.2 - PROGRAM MAINTENANCE FORM

* ACTION: _ *

SITE: PULLMAN STANDARD CO

EPA ID: ALD004017729 PROGRAM CODE: H01 PROGRAM TYPE: _ *

PROGRAM QUALIFIER: ALIAS LINK : * _ *

PROGRAM NAME: SITE EVALUATION * _ *

DESCRIPTION:

* _ *

* _ *

* _ *

* _ *

REGION: 04
STATE : AL

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L A

PAGE: 1332
RUN DATE: 85/06/03
RUN TIME: 19:06:17

M.2 - EVENT MAINTENANCE FORM

* ACTION: _ *

SITE: PULLMAN STANDARD CO
PROGRAM: SITE EVALUATION

EPA ID: ALD004017729 PROGRAM CODE: H01 EVENT TYPE: DS1

FMS CODE: EVENT QUALIFIER: EVENT LEAD: E

EVENT NAME: DISCOVERY STATUS:

DESCRIPTION:

* _ _ _ _ _ *

* _ _ _ _ _ *

* _ _ _ _ _ *

* _ _ _ _ _ *

* _ _ _ _ _ *

ORIGINAL	CURRENT	ACTUAL
START:	START:	START:
COMP :	COMP :	COMP : 80/08/01

* _/_/_ _/_/_ _/_/_ *

* _/_/_ _/_/_ _/_/_ *

HQ COMMENT:

* _ _ _ _ _ *

RG COMMENT:

* _ _ _ _ _ *

COOP AGR # AMENDMENT # STATUS STATE %

* _ _ _ _ _ *

REGION: 04
STATE : AL

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L A

PAGE: 1333
RUN DATE: 85/06/03
RUN TIME: 19:06:17

M.2 - EVENT MAINTENANCE FORM

* ACTION: _ *

SITE: PULLMAN STANDARD CO
PROGRAM: SITE EVALUATION

EPA ID: ALD004017729 PROGRAM CODE: H01 EVENT TYPE: PA1

FMS CODE: EVENT QUALIFIER: EVENT LEAD: S

EVENT NAME: PRELIMINARY ASSESSMENT STATUS:

DESCRIPTION:

* _ *

* _ *

* _ *

* _ *

* _ *

* _ *

ORIGINAL	CURRENT	ACTUAL
START:	START:	START: 85/03/01
COMP :	COMP :	COMP : 85/03/01

* _/_/_ _/_/_ _/_/_ *

* _/_/_ _/_/_ _/_/_ *

HQ COMMENT:

* _ *

RG COMMENT:

* _ *

COOP AGR # AMENDMENT # STATUS STATE %

* _ _ _ _ *

REGION: 04
STATE : AL

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L A

PAGE: 1334
RUN DATE: 85/06/03
RUN TIME: 19:06:17

M.2 - COMMENT MAINTENANCE FORM

SITE: PULLMAN STANDARD CO

EPA ID: ALD004017729

COM

NO COMMENT

ACTION

001 PART A-ON FILE

*

*

*

*



POTENTIAL HAZARDOUS WASTE SITE
TENTATIVE DISPOSITION

REGION SITE NUMBER

4 ALD004017729

File this form in the regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency, Site Tracking System, Hazardous Waste Enforcement Task Force (EN-335), 401 M St., SW, Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME Full name Standard Div. of Pullman Ave. B. STREET 5th Ave. & 24th St
C. CITY Bessemer D. STATE AL E. ZIP CODE 35020

II. TENTATIVE DISPOSITION

Indicate the recommended action(s) and agency(ies) that should be involved by marking 'X' in the appropriate boxes.

RECOMMENDATION	MARK 'X'	ACTION AGENCY			
		EPA	STATE	LOCAL	PRIVATE
A. NO ACTION NEEDED -- NO HAZARD	X				
B. INVESTIGATIVE ACTION(S) NEEDED (If yes, complete Section III.)					
C. REMEDIAL ACTION NEEDED (If yes, complete Section IV.)					
D. ENFORCEMENT ACTION NEEDED (If yes, specify in Part E whether the case will be primarily managed by the EPA or the State and what type of enforcement action is anticipated.)					

E. RATIONALE FOR DISPOSITION

Cleaning of site in 1980 confirmed by ADEM, no on-site disposal.

F. INDICATE THE ESTIMATED DATE OF FINAL DISPOSITION (mo., day, & yr.)

G. IF A CASE DEVELOPMENT PLAN IS NECESSARY, INDICATE THE ESTIMATED DATE ON WHICH THE PLAN WILL BE DEVELOPED (mo., day, & yr.)

H. PREPARER INFORMATION

1. NAME Ron W. Jones 2. TELEPHONE NUMBER FTS 257-2234 3. DATE (mo., day, & yr.) 12-6-84

III. INVESTIGATIVE ACTIVITY NEEDED

A. IDENTIFY ADDITIONAL INFORMATION NEEDED TO ACHIEVE A FINAL DISPOSITION.

B. PROPOSED INVESTIGATIVE ACTIVITY (Detailed Information)

1. METHOD FOR OBTAINING NEEDED ADDITIONAL INFO.	2. SCHEDULED DATE OF ACTION (mo., day, & yr.)	3. TO BE PERFORMED BY (EPA, Contractor, State, etc.)	4. ESTIMATED MANHOURS	5. REMARKS
a. TYPE OF SITE INSPECTION				
(1)				
(2)				
(3)				
b. TYPE OF MONITORING				
(1)				
(2)				
c. TYPE OF SAMPLING				
(1)				
(2)				

III. INVESTIGATIVE ACTIVITY NEEDED and PART B. PROPOSED INVESTIGATIVE ACTIVITY (Continued)

d. TYPE OF LAB ANALYSIS				
(1)				
(2)				
e. OTHER (specify)				
(1)				
(2)				

C. ELABORATE ON ANY OF THE INFORMATION PROVIDED IN PART B (on front & above, AS NEEDED TO IDENTIFY ADDITIONAL INVESTIGATIVE WORK.

D. ESTIMATED MANHOURS BY ACTION AGENCY

1. ACTION AGENCY	2. TOTAL ESTIMATED MANHOURS FOR INVESTIGATIVE ACTIVITIES	1. ACTION AGENCY	2. TOTAL ESTIMATED MANHOURS FOR INVESTIGATIVE ACTIVITIES
a. EPA		b. STATE	
c. EPA CONTRACTOR		d. OTHER (specify)	

IV. REMEDIAL ACTIONS

A. SHORT TERM EMERGENCY STRATEGY (On Site & Off-Site) List all emergency actions needed to bring site under immediate control, e.g., restrict access, provide alternate water supply, etc. See instructions for a list of Key Words for each of the actions to be used in the space below.

1. ACTION	2. EST. START DATE (mo, day, & yr)	3. EST. END DATE (mo, day, & yr)	4. ACTION AGENCY (EPA, State, Private Party)	5. ESTIMATED COST	6. SPECIFY 311 OR OTHER ACTION; INDICATE THE MAGNITUDE OF THE WORK REQUIRED
				\$	
				\$	
				\$	
				\$	
				\$	
				\$	

B. LONG TERM STRATEGY (On Site & Off-Site) List all long term solutions, e.g., excavation, removal, ground water monitoring wells, etc. See instructions for a list of Key Words for each of the actions to be used in the spaces below.

1. ACTION	2. EST. START DATE (mo, day, & yr)	3. EST. END DATE (mo, day, & yr)	4. ACTION AGENCY (EPA, State, Private Party)	5. ESTIMATED COST	6. SPECIFY 311 OR OTHER ACTION; INDICATE THE MAGNITUDE OF THE WORK REQUIRED
				\$	
				\$	
				\$	
				\$	
				\$	
				\$	

C. ESTIMATED MANHOURS AND COST BY ACTION AGENCY

1. ACTION AGENCY	2. TOTAL EST. MANHOURS FOR REMEDIAL ACTIVITIES	3. TOTAL EST. COST FOR REMEDIAL ACTIVITIES	1. ACTION AGENCY	2. TOTAL EST. MANHOURS FOR REMEDIAL ACTIVITIES	3. TOTAL EST. COST FOR REMEDIAL ACTIVITIES
a. EPA			b. STATE		
c. PRIVATE PARTIES			d. OTHER (specify)		

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
EPS FORM 3012-III

INDUSTRIAL NARRATIVE SHEET

1. Site Identification:

Site number: ALD004027729

Site name: Pullman Standard, Division of Pullman Inc.

Site county: Jefferson

2. Industrial Narrative Summary:

Company Name: Pullman Standard, Division of Pullman Inc.

Address: 5th Avenue and 24th Street
Bessemer, AL 35020

Telephone No.: 205/425-3240

Contact: Hugh Bryant

Discussion: Pullman Standard fabricates steel in the production of railcars. In this process they are involved in welding, riveting, bolting, shot blasting, and painting. Their waste products include waste paint as well as the solvents toluene and xylene. This facility closed during 1980 and at that time, they spent both time and money to remove all the remaining waste products from the site. They did not withdraw from interim status in the hope they would be able to reopen or be bought out. In late 1983, they were purchased by Trinity Industries of Dallas, Texas, and operations have resumed as of September 1, 1984. At this time they hope to operate under the Pullman name and remain a division of Trinity Indust. They will operate as a generator only.

For approximately 10 years prior to ceasing operations, waste materials were kept in drums at the site. Waste paints that were left over were kept in the original drum and placed in their yard. Before that time, waste paint materials were hauled from the site every 5-6 years. The company representative believed that the materials were burned. Before the mid 1960's, the painting operations were done outside and they did not use a great deal of solvents. In or around 1965, they built a building to house the painting operations and at that time they began using more solvents to clean the reusable stencils when they got clogged. Disposal of these materials is

uncertain. To the best of knowledge, there has been no on-site disposal of hazardous waste.

Withdrawal from interim status has been requested and granted. Before being allowed to withdraw from interim status, a representative from ADEM visited the site and evaluated the cleanup operations. At that time, they found the site to be clean with no evidence of any on-site disposal or unregulated areas.

3. Disposition:

No further action required at this site under this program. To their best knowledge, there has been no on-site disposal of hazardous wastes at this site and all remaining wastes were removed from the site when they closed in 1980. The company has withdrawn from interim status and has reopened recently under new ownership. They will be regulated as a generator only by ADEM.

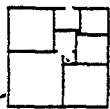
4. Comments:

Specific information about disposal of the wastes was unavailable at this time. This reviewer believes that the potential exists that these waste materials were taken to local landfills in operation during the time period this company operated.

WALD004017729										EUP									
---------------	--	--	--	--	--	--	--	--	--	-----	--	--	--	--	--	--	--	--	--

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES										E. PROCESS DESCRIPTION (if a code is not entered in D(1))																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
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NUS
CORPORATION

1927 LAKESIDE PARKWAY
SUITE 614
TUCKER, GEORGIA 30084
404-938-7710

ATTACHMENT 2

NEAR

C-586-3-9-11

March 8, 1989

Mr. A.R. Hanke
Site Investigation and Support Branch
Waste Management Division
Environmental Protection Agency
345 Courtland Street, N. E.
Atlanta, Georgia 30365

Date: _____
Site Disposition: _____
EPA Project Manager: _____

Subject: Preliminary Reassessment
Pullman Standard
Birmingham, Jefferson County, Alabama
EPA ID No. ALD004017729
TDD No. F4-8811-20

Dear Mr. Hanke:

FIT 4 conducted a preliminary reassessment of Pullman Standard Company in Birmingham, Alabama. The assessment included a review of EPA and state file material, completion of a target survey and a drive-by reconnaissance of the facility on December 1, 1988.

Pullman Standard has been fabricating steel in the production of railroad cars since 1929 (Ref. 1). This process involved welding, riveting, bolting, shot blasting, and painting. Waste products include waste paint and solvents including toluene and xylene. This facility closed in 1980 at which time all remaining waste products were removed from the site. At that time, Pullman Standard did not withdraw their RCRA interim status in the hope that the facility would be able to reopen or be bought out. In late 1983, Trinity Industries of Dallas, Texas, purchased the facility and operations resumed on September 1, 1984 (Ref. 1).

For approximately 10 years prior to ceasing operations, waste materials were kept in drums at the facility. During this time waste paints were kept in their original drums and placed in the facility yard. Before 1970, the waste paint materials were hauled from the site every 5-6 years. Before the mid 1960's, the painting was done outside and use of solvents was limited. In or around 1965, a building was erected to house the painting operations. At that time Pullman Standard began using more solvents to clean the reusable stencils. The method of disposal of these waste materials is uncertain. There are no records indicating any onsite disposal of hazardous waste. Currently, Pullman is classified as a hazardous waste generator under RCRA. The company withdrew its Part B application as a storage facility (Ref. 2).

Pullman Standard is located in the Birmingham Valley physiographic section of the Valley and Ridge Physiographic Province (Ref. 3). The area is characterized by northeast-southwest trending valleys and ridges, which exhibit extensive faulting and folding (Ref. 3, pp. 1, 3). As a result of these structural features vast differences in geologic and hydrogeologic environments occur over distances of only a few miles (Ref. 3, p. 1). Groundwater occurs in solution cavity channels and fracture zones

010027

Mr. A. R. Hanke
Environmental Protection Agency
TDD No. F4-8811-20
March 2, 1989 - page two

within these tectonically altered rock units (Ref. 4). Recharge to groundwater is by percolation of precipitation. Net annual rainfall for the area is 11 inches (Ref. 5).

Geologic units that occur within a 4-mile radius of the site, in descending order include: the Parkwood Formation, the Floyd Shale; the Hartselle Sandstone; the Pride Mountain Formation; the Tuscumbia Limestone, Fort Payne Chert, and Maury Formation; the Chattanooga Shale and Frog Mountain Sandstone; the Red Mountain Formation; the Chickamauga Limestone; the Attalla Chert Conglomerate Member of the Chickamauga Limestone; the Knox Group undifferentiated, the Ketona Dolomite, and the Conasauga Formation (Ref. 6, Maps 19, 20, 26). Together, these units represent an aggregate thickness of over 10,000 feet of sediment. The presence and thickness of any particular rock unit is dependent on its location within this complex structural setting. Extensive faulting and folding has exposed at land surface the previously mentioned formations (Ref. 3, pp. 7-13). This structural complexity differs from the traditional "layer cake" concept of aquifer and confining layer. These aquifers are unconfined at the surficial outcrop, but may be confined at depth (Ref. 3, pp. 18, 19).

If any groundwater supplies in Jefferson County are used, they are primarily derived from rock units having well-developed water-bearing solution and structural features. Within a 4-mile radius of the facility, the Fort Payne Chert, Tuscumbia Limestone aquifer and the Bangor Limestone aquifer are considered to have the greatest potential for development as a groundwater resource. These aquifers currently sustain large volume production wells with yields of greater than 150 gpm (Ref. 3, pp. 41, 42). However, these aquifers are not present in the immediate vicinity of the facility (Ref. 6, Maps 13, 14, 20, 21).

The water-bearing rock units underlying the facility are contained within the outcropping Conasauga Formation (Ref. 6, Map 20). The Conasauga Formation is considered to be a good aquifer in the area, and consists of thinly-bedded brownish-gray sublithographic limestone, gray shale, and brownish-gray dolomite (Refs. 4, pp. 96, 97; 6, p. 3). The beds within this formation dip steeply and contain well-developed solution features capable of producing large quantities of water (Ref. 4, pp. 96, 97). Groundwater from the Conasauga Formation occurs at variable depth from surficial springs to wells 600 feet deep (Ref. 3, pp. 60-75).

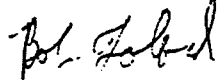
Surface water runoff from the site would be via two streams that flow to the northwest into Valley Creek. One stream transects the southwest end of the facility property, the other stream is located about 1000 feet northeast of the northeast end of the property (Ref. 7). There are no surface water intakes within 15 miles downstream of the facility (Ref. 8). Valley Creek is not used for fishing (Ref. 9).

Bessemer purchases water from Birmingham, which services the majority of Jefferson County. Birmingham obtains its water from four sources that do not receive drainage from the facility. The intakes are on the Cahaba River (intake is at Elmore Lake, if level is too low, water is drawn from Lake Purdy), Smith Lake (located in Walker County), and Inland Lake (located in Blount County) (Ref. 8). There are no drinking water wells within a 4-mile radius of Pullman Standard.

Mr. A. R. Hanke
Environmental Protection Agency
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Based on the above-referenced information and enclosures, FIT 4 recommends that no further remedial action be planned for this facility.

Very truly yours,



Bob Tolford
Project Manager

BT/kw

Enclosures

cc: _____ EPA PO

Approved:



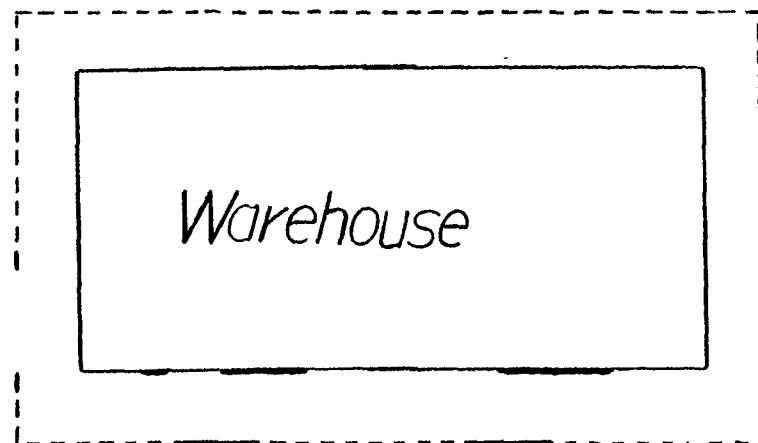
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NUS CORPORATION

REFERENCES

1. Potential Hazardous Waste Site Preliminary Assessment (EPS forms 3012-II and 3012-111) for Pullman Standard.
2. Joe Downey, Alabama Department of Environmental Management, telephone conversation with Bob Tolford, NUS Corporation, December 12, 1988. Subject: RCRA status of four Alabama sites.
3. T. B. Moffett, and P. H. Moser, Groundwater Resources of the Birmingham and Cahaba Valleys of Jefferson County, Alabama, Circular 103, (University, Alabama: Geological survey of Alabama, 1978), pp. 1-44.
4. W. D. Johnson, Groundwater in the Palozoic Rocks of Northern Alabama, Special Report No. 16, (Geologic Survey of Alabama, 1933).
5. U.S. Department of Commerce, Climatic Atlas of the United States, (Washington, D.C.: GPO, June 1968), Reprint: 1983, National Oceanic and Atmospheric Administration.
6. J. T. Kidd, Areal Geology of Jefferson County, (Geological Survey of Alabama, Atlas 15, 1979).
7. U.S. Geological Survey, 7.5 minute series Topographic Quadrangle Maps of Alabama, Concord 1979; Bessemer 1959 (Photorevised 1970 and 1978), Birmingham South 1959 (Photorevised 1970 and 1978), Greenwood 1959 (Photorevised 1978).
8. NUS Corporation, April 26, 1988. Field Logbook No. F4-814 for Reconnaissance of Hayes International Corporation, TDD No. F4-8804-48.
9. George Edwards, Vallhala Cemetary, telephone conversation with Bob Tolford, NUS Corporation, December 15, 1988. Subject: Recreational use of Valley Creek.

BESSEMER DRUM SITE



20th Street

9th Ave.

Ray
Thomas
Garage



Houses

not to
scale